

**To:** CN=Phil North/OU=R10/O=USEPA/C=US@EPA[]  
**Cc:** CN=Heidi Karp/OU=DC/O=USEPA/C=US@EPA[]  
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**From:** CN=Palmer Hough/OU=DC/O=USEPA/C=US  
**Sent:** Tue 9/28/2010 10:35:57 PM  
**Subject:** Takings Articles re: Bristol Bay

Phil:

When you have a moment, please forward the two legal articles that you mentioned regarding the takings issue and Bristol Bay. You mentioned one that was published which argued that the mining companies would not have a takings claim and another unpublished article by Reeves arguing the opposite.

Thanks, Palmer

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